

REMARKS

Claims 1-17 and 19-22 are pending in this application. By this Amendment, claims 1, 5, 11, 15, 16 and 22 are amended and claim 18 is canceled, without prejudice to or disclaimer of the subject matter contained therein. No new matter is added.

The courtesies extended to Applicants' representatives by Examiners Meier and Martin at the interview held July 19, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview.

The Office Action rejects claims 1-5, 7-16, 18-20 and 22 under 35 U.S.C. §103(a) over U.S. Patent No. 5,670,995 Kupcho et al. (Kupcho) in view of U.S. Patent No. 6,341,839 to Burikov et al. (Burikov). This rejection is respectfully traversed.

As discussed during the personal interview, independent claims 1 and 11 are amended to recite, *inter alia*, "two spaced rollers, each rotatable about a central axis, ... the central axes are essentially orthogonal to a recording medium path." The changes are supported, for example, by Figs. 2, 3A, 4-8. That is, the rollers are oriented so that the printhead travels around the endless drive path loop while facing the same side of the recording medium. No new matter is added.

As agreed upon during the personal interview, independent claims 1 and 11 define over the combination of Kupcho in view of Burikov because both references teach a different orientation for double-sided printing. Accordingly, independent claims 1 and 11 and claims 2-5, 7-10, 12-16, and 18-20 dependent therefrom define over Kupcho and Burikov and are allowable.

As further discussed during the interview, independent claim 22 is also amended for clarity and recites, *inter alia*, "a single endless drive belt loop connected between said at least two spaced rollers ... a printhead assembly including at least two printheads and carriages

operably connected to the single endless drive belt loop" (emphasis added). The changes are supported, for example, by paragraph [0071] and Fig. 11. No new matter is added.

Each of Kupcho and Burikov teach use of a single printhead per belt or loop, with two loops needed for two printheads. Although Kupcho may arguably appear diametrically opposed, each print head is located on its own separate drive belt (col. 6, lines 39-56, Fig 3, col. 7, lines 25-26). Because the printheads in Kupcho operate independent from each other, they cannot maintain a diametrically opposed position throughout the printing process.

This feature is not taught and advantages not appreciated by Kupcho or Burikov. Burikov fails to overcome deficiencies of Kupcho. Besides not teaching use of two printheads that are diametrically opposed, Burikov also has a printhead that is independently driven. Thus, even if multiple printheads were used, the resultant structure would not achieve diametrical alignment and thus would suffer print timing or balance problems. Thus, even if combined, Kupcho and Burikov fail to teach the subject matter of independent claim 22 or claims dependent therefrom. Accordingly, claim 22 and claims dependent therefrom define over the combination of Kupcho and Burikov.

Dependent claims 5 and 15 are amended for clarity to recite, *inter alia*, "wherein the endless loop drive path consists of two linear print zones disposed on the same side of the recording medium" (emphasis added). The changes are supported by, for example, paragraph [0066] and Figs. 2, 3A, 4-8. No new matter is added.

With respect to dependent claims 5 and 15, even if Kupcho and Burikov, alone or combined, could achieve single-side printing, the printing would not be efficient because there could only be a single print swath printed per cycle. As admitted in the Office Action, Kupcho does not teach two print zones or the recited spacing S_N . The Office Action fails to identify any structure in Burikov having this feature. Rather, Burikov also only teaches one print zone on each side of the paper (Fig. 2). Moreover, neither reference appreciates

problems with such printing or advantages to a specific spacing of S_N, which allows for a uniform striped print and simplified print control. Accordingly, a *prima facie* case of obviousness has not been met.

Because each and every feature of dependent claims 5 and 15 is not met by Kupcho or Burikov, claims 5 and 15 define over the combination of Kupcho and Burikov.

Withdrawal of the rejection is respectfully requested.

The Office Action rejects claim 6 under 35 U.S.C. §103(a) over Kupcho in view of Burikov further in view of U.S. Patent No. 4,980,009 to Goodwin et al. (Goodwin). This rejection is respectfully traversed.

Goodwin fails to overcome the deficiencies of Kupcho and Burikov with respect to independent claim 1. Accordingly, claim 6 is allowable for its dependence on allowable base claim 1 and for the additional features recited therein. Withdrawal of the rejection is respectfully requested.

The Office Action rejects claim 17 under 35 U.S.C. §103(a) over Kupcho and Burikov further in view of U.S. Patent Application Publication No. 2003/0227511 to Menendez et al. (Menendez). This rejection is respectfully traversed.

Menendez fails to overcome the deficiencies of Kupcho and Burikov with respect to independent claim 11. Accordingly, claim 17 is allowable for its dependence on allowable base claim 11 and for the additional features recited therein. Withdrawal of the rejection is respectfully requested.

The Office Action rejects claim 21 under 35 U.S.C. §103(a) over Kupcho and Burikov further in view of U.S. Patent No. 6,325,503 to McCue, Jr. et al. (McCue, Jr) The rejection is respectfully traversed.

McCue, Jr. fails to overcome the deficiencies of Kupcho and Burikov with respect to independent claim 11. Accordingly, claim 21 allowable for its dependence on allowable base

claim 11 and for the additional features recited therein. Withdrawal of the rejection is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-17 and 19-22 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Date: July 26, 2006

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